

1
2
3
4 AARON VELARDE, et al.,
5 Plaintiffs,
6 v.
7 UNION CITY POLICE DEPARTMENT, et
8 al.,
9 Defendants.

10 Case No. 13-cv-04011-JD

11 **PROPOSED VOIR DIRE**

12 The parties did not file any proposed voir dire questions. Consequently, the Court will ask
13 these voir dire questions in addition to the Court's standard questions. The parties are responsible
14 for filing a final witness list and a list of all attorneys involved in the case for use during voir dire.
15 The parties should file the lists with the Court by December 4, 2015, and bring at least 10 copies
16 of each to jury selection on December 7, 2015.

17 **IT IS SO ORDERED.**

18 Dated: December 3, 2015

19
20
21 JAMES DONATO
22 United States District Judge
23
24
25
26
27
28

VOIR DIRE QUESTIONS

1. Have you or anyone close to you ever worked for a lawyer or law firm?
2. Do you or anyone close to you have experience in the legal profession?
3. Have you ever had to appear in court, or in any court proceeding, as a plaintiff, defendant, victim or witness?
4. Have you or anyone close to you ever worked in any public safety, law enforcement or criminal justice system job?
5. Have you or anyone close to you worked for any other federal, state or local government agency?
6. Have you or anyone close to you worked for Union City?
7. Do you have any strong positive or negative feelings about Union City?
8. Have you or anyone close to you worked for the Union City Police Department?
9. Do you have any strong positive or negative feelings about the Union City Police Department?
10. Would you consider the testimony of a law enforcement witness to be less credible or more credible than the testimony of any other witness for any reason?
11. Do you think lawsuits involving civil rights claims are unfair or unjust and should not be brought to court?
12. Do you have any strong positive or negative feelings about awarding damages for violations of civil rights?
13. Do you think lawsuits involving excessive force claims against the police are unfair or unjust and should not be brought to court?
14. Do you have any strong positive or negative feelings about awarding damages for claims of excessive force by the police?
15. Do you have any difficulty understanding or reading the English language?
16. On your seats are lists of attorneys involved with this case and potential witnesses. Do you know or are you familiar with any of the attorneys?

1 17. Do you know or are you familiar with any of the potential witnesses?

2 18. Is there anything I have not asked you about that you believe could affect your ability to be
3 a fair and impartial juror?

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28